STATE WATER RESOURCES CONTROL BOARD (SWRCB)
DIVISION OF FINANCIAL ASSISTANCE (DIVISION)
May 2008
WATER CONSERVATION REVIEW PROCEDURES

Section IX(C) of *Policy for Implementing the Clean Water State Revolving Fund for Construction of Wastewater Treatment Facilities* (Policy) requires applicants to have an approved Water Conservation Program (Program), or waiver, before the SWRCB issues a preliminary funding commitment. The Program must cover at least 75 percent of the water connections within the service area, must be consistent with local ordinances and authorities, and must be accepted by the Division. The applicant may become a signatory to the *Memorandum of Understanding Regarding Urban Water Conservation in California* (MOU) instead of adopting an independent Program. If the applicant is not the water purveyor for the service area, then the applicant must certify that the water purveyor(s) either has an approved water conservation program or is a signatory to the MOU.

The easiest and best way to implement the Water Conservation Program is to become a signatory to and follow the Best Management Practices (BMPs) listed in the MOU. If signing on the MOU is not feasible, applicants and water purveyors may adopt their own water conservation programs that are specific to their individual water needs. In this situation, a water conservation program must be submitted to the Division for review to determine compliance with the Division's water conservation criteria.

Programs submitted for review should include discussions of the following areas:

- Water Supply and Area Characteristics
- Current Water Conservation Program
- Evaluation of Alternative Measures
- Recommended Water Conservation Program
- Water Shortage Plan

WATER SUPPLY AND AREA CHARACTERISTICS

Water supply and area characteristics should include an estimate of past, current, and projected potable and reclaimed water use. Relate these estimates to demographic users (residential, industrial, irrigation, and landscape) with the estimated percentage of water consumption per user type. The current status of groundwater, surface water, reclaimed water, and purchased water with respect to over all supply, demand, and quality should also be considered. A quantified analysis of the cost per unit volume must be evaluated so that water consumption savings with respect to water conservation mechanisms versus cost savings with respect to production and distribution of potable water can be compared.

CURRENT WATER CONSERVATION PROGRAM

A comprehensive review of the current Water Conservation Program with a description of the various water conservation measures must be included. This review should consist of an explanation of the BMPs used by the applicant, an estimated overall amount of water conserved by the BMP, and an estimated implementation cost of each BMP.

EVALUATION OF ALTERNATIVE MEASURES

An evaluation of alternative measures should consider no less than all BMPs specified in the MOU. An analysis of the applicability, cost effectiveness, potential water savings, public acceptance, non-quantifiable benefits, and ability to implement should be performed on each BMP. Each BMP should be analyzed individually and should contain the most optimum level of implementation with respect to different types of water users (i.e. if it is not effective to provide low flush toilets to all water consumers, would it be effective to replace toilets of the top 10 percent of residential water users?)

If any of the BMPs are determined to not be applicable or implementable, a discussion and justification must be given so that these measures may be waived. An example of justification for waiving BMP #9 would be that commercial and industrial water users do not exist within the water purveyor's distribution area.

The 14 BMPs discussed in the MOU are listed below:

1. Water Survey Programs For Single-Family Residential And Multi-Family Residential Customers
2. Residential Plumbing Retrofit
3. System Water Audits, Leak Detection And Repair
4. Metering With Commodity Rates For All New Connections And Retrofit Of Existing Connections
5. Large Landscape Conservation Programs And Incentives
6. High-Efficiency Clothes Washing Machine Financial Incentive Programs
7. Public Information Programs
8. School Education Programs
9. Conservation Programs For Commercial, Industrial, And Institutional Accounts
10. Wholesale Agency Assistance Programs
11. Retail Conservation Pricing
12. Conservation Coordinator
13. Water Waste Prohibition
14. Residential Ultra-Low Flush Toilet Replacement Programs

A full description of the elements of the BMPs contained in the MOU is available at the California Urban Water Conservation Council: http://www.cuwcc.com.

RECOMMENDED WATER CONSERVATION PROGRAM

The Recommended Water Conservation Program should consist of all BMPs found to be effective after the evaluation process is done. The Program should clearly identify the resources and time required to implement each of the effective BMPs.

WATER SHORTAGE PLAN

Provide an urban water shortage contingency analysis which includes each of the following elements which are within the authority of the urban water supplier:

1. Stages of action to be undertaken by the urban water supplier in response to water supply shortages, including up to a 50 percent reduction in water supply, and an outline of specific water supply conditions which are applicable to each stage.
2. An estimate of the minimum water supply available during each of the next three water years based on the driest three-year historic sequence for the agency's water supply.

3. Actions to be undertaken by the urban water supplier to prepare for, and implement during a catastrophic interruption of water supplies including, but not limited to, a regional power outage, an earthquake, or other disaster.
4. Additional, mandatory prohibitions against specific water use practices during water shortages, including, but not limited to, prohibiting the use of potable water for street cleaning.
5. Consumption reduction methods in the most restrictive stages. Each urban water supplier may use any type of consumption reduction methods in its water shortage contingency analysis that would reduce water use reduction consistent with up to a 50 percent reduction in water supply.
6. Penalties or charges for excessive use, where applicable.
7. An analysis of the impacts of each of the actions and conditions described in (a) to (f) above, inclusive, on the revenues and expenditures of the urban water supplier, and proposed measures to overcome those impacts, such as the development of reserves and rate adjustments.
8. A draft water shortage contingency resolution or ordinance.
9. A mechanism for determining actual reductions in water use pursuant to the urban water shortage contingency analysis.

OTHER STATE LAW

The Urban Water Management Planning Law, Water Code, Part 2.6, Section 10610 et.seq., requires every urban water supplier to prepare and adopt an Urban Water Management Plan that includes specific elements. Water urban suppliers, either publicly or privately owned, providing water for municipal purpose either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually are subject to this Law. Agencies may submit an Urban Water Management Plan instead of a Water Conservation Program in meeting the water conservation requirement (Section 10653 of the Water Code).